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June 20, 2025

Brian Fischer
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Hon. Jeannette A. Vargas
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: In Re *Ex Parte* Application of YOUNGPOONG CORPORATION, Applicant, for an Order Pursuant to 28 U.S.C. § 1782 to Take Discovery for Use in Foreign Proceedings, Case No. 25-MC-194

Dear Judge Vargas:

We write on behalf of Youngpoong Corporation, the Applicant in this action (“Youngpoong”), to note that Youngpoong has filed an Amended Application for an Order Pursuant to 28 U.S.C. § 1782 Authorizing it to Seek Discovery from PedalPoint Holdings, LLC.

Youngpoong filed its original Application on April 28, 2025, and filed an updated Application and supporting Declarations on April 30, 2025 (“Application”)¹ The Application, which is pending, is now superseded by this amendment.

In its initial Application, Youngpoong relied as the basis for discovery under § 1782 on two proceedings in Korea: a civil shareholder suit (“Shareholder Suit”) and a related criminal complaint. Youngpoong now wishes to rely solely on the Shareholder Suit as the basis for § 1782 discovery. Youngpoong has now filed an Amended Application that relies on the Shareholder Suit alone. *See* Dkts. 14-18. The Amended Application seeks entry of an order to serve the Subpoenas attached as Exhibits A-F to the Declaration of Brian J. Fischer.

Sincerely,

/s/ Brian J. Fischer
Brian J. Fischer

¹ The original Application was inadvertently filed as a civil action on April 28, 2025. Dkt. 1. On April 30, counsel for Youngpoong was instructed to re-file the Application as a miscellaneous action, Docket Entry, April 30, 2025, and thereafter did so. Dkts. 10-13.